

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Daniel L. Simon,)	
)	
Plaintiff,)	CIVIL ACTION NO.
)	04-10716 RWZ
vs.)	
)	
Choice Hotels International, Inc.,)	
New England Resort Management,)	
LLC d/b/a Clarion Nantasket)	
Beach Hotel,)	
Ferdinand J. Kiley,)	
)	
Defendants.)	

JOINT MOTION TO EXTEND DISCOVERY DEADLINE

Now come the Parties, by their respective counsel, and respectfully request a brief sixty (60) day extension of the discovery deadline in the above action, to and including **March 1, 2005**. As good cause for the allowance of the within motion, the Parties respectfully submit that:

1. This is the first such extension requested by the Parties.
2. The Parties request this extension due to scheduling constraints on other matters, including a state court trial for Plaintiff's counsel.
3. The Parties are additionally engaged in settlement negotiations and the allowance of the within motion may further aid in the said negotiations and further promote the efficient use of the Parties' and the Court's resources..
4. The allowance of the within motion will not affect any of the remaining deadlines in this action.

WHEREFORE, the Parties respectfully request that the within motion be ALLOWED.

Respectfully Submitted,

Daniel L. Simon
By his attorney,

All Defendants
By their attorney,

/s/ Paul F. Wood
Paul F. Wood, BBO 565195
Law Office of Paul F. Wood, P.C.
45 Bowdoin Street
Boston, MA 02114
(617) 532-2666

/s/ Kevin Hern, Jr. (pfw w/permission)
Kevin Hern, Jr., BBO# 231905A
Rierner & Braunstein LLP
3 Center Plaza
Boston, MA 021081
(617) 880-3554